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April 21, 2023

VIA ECF

Honorable Brian M. Cogan
United District Court Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Government Employees Insurance Company et al v. Sherrie Ann Rawlins, M.D., et al.*
Civil Case No.: 1:22-cv-07917-BMC

Dear Judge Cogan:

As this Court is aware, this firm represents Plaintiffs (collectively, “GEICO” or “Plaintiffs”) in the above-referenced action. GEICO submits this status letter: (i) to request that the Court adjourn the Initial Status Conference set for April 27, 2023 at 10:15a.m.; and (ii) to request a further Order from the Court pursuant to Fed. R. Civ. P. 26(d) granting additional expedited discovery in the form additional non-party subpoenas, as described in more detail below, to aid in identifying the John Doe Defendants.

First, GEICO requests to adjourn the initial conference because none of the Defendants have appeared in this action and they are in Default. See Docket Nos. 16-18. This is GEICO’s fourth request to adjourn the Initial Conference as the Court most recently granted GEICO’s request to adjourn the initial conference via the March 21, 2023 Docket Order.

Next, GEICO requests an Order pursuant to Fed R. Civ P. 26(d) granting additional expedited discovery. GEICO respectfully refers the Court to GEICO’s original motions for expedited discovery for a description of the fraudulent scheme, the acts perpetrated by the John Doe Defendants, and the discovery received to date. See Docket Nos. 15, 21. Based on a non-party subpoena served pursuant to the Court’s March 21, 2023 Order on TD Bank for accounts related to Sherrie Rawlins Medical, P.C. (“Rawlins Medical”), and Dr. Sherrie Ann Rawlins (a Sole Proprietorship) (the “Rawlins SP”, and collectively with Rawlins Medical, the “Rawlins Practices”), GEICO has identified over \$819,000.00 in checks issued by Rawlins Medical to various shell corporations. Each one of these checks were cashed at one of three check cashing facilities located in New Jersey: (i) Banc Alt LLC d/b/a Check Pros Financial Services; (ii) City Financial Inc.; and (iii) Cambridge Clarendon Financial Service LLC (collectively the “Check Cashing Facilities”). To aid in GEICO’s efforts to identify the John Doe Defendants, GEICO seeks to serve non-party subpoenas on the Check Cashing Facilities to secure documents and testimony that will reveal records associated with the cashing of these checks,



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including the identity of the person(s) presenting the checks for payment and all authorizations relating to any check cashing account.

To further update the Court, in accordance with the Court's March 21, 2023 Docket Order, GEICO also served additional non-party subpoenas on the two funding companies, Funding 4 Doctors L.L.C. ("Funding 4 Doctors") and Family Fund Capital, L.L.C. ("Family Fund") that provided funding to the Rawlins Practices. The subpoena to Funding 4 Doctors is returnable April 21, 2023, and the subpoena to Family Fund is returnable April 26, 2023. GEICO will review these responses once they are received and determine if the John Doe Defendants can be identified. GEICO will further apprise the Court of the progress made in identifying the John Doe Defendants and, if necessary, request permission to serve additional non-party subpoenas pursuant to Fed R. Civ P. 26(d).

We thank the Court for its time and consideration.

Respectfully submitted,

RIVKIN RADLER LLP
s/ Philip P. Nash
Philip P. Nash

cc: All Counsel of Record (via ECF)